

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
Milwaukee Division

U.S. DISTRICT COURT
EASTERN DISTRICT - WI
FILED

ALPER KOLCU, Plaintiff,

v.

Case No. 22-CV-1552-LA

JURY TRIAL DEMANDED

2024 FEB 23 A 9:57

SHERIFF DENITA R. BALL, et al,
Defendants, (See attached)

CLERK OF COURT

Re; PLAINTIFF'S REQUEST FOR PRODUCTION,

TO:

Counsel of Record, For Defendants
U.S. District Court, WI E.D.
E Wisconsin Ave, 362,
Milwaukee, WI, 53233

NOW COMES, the Plaintiff, ALPER KOLCU, and respectfully requests that this Court's Order (ECF 14) be complied with, and as grounds therefore would state, as follows;

I. DISCOVERY REQUEST and PRODUCTION OF DOCUMENTS

Pursuant to Sections, 971.23 and 971.24 and 971.25 of the Wisconsin Statutes, Fed. R. Civ. P. R. 34, the American Bar Association Project on Standards for Criminal and Civil Justice Standards Relating to Discovery and Procedure Before trial, supporting federal and state case law, the Fifth, Six and Fourteenth Amendments to the Constitution of the United States and the correlated provisions of the Wisconsin Constitution the Plaintiff demands of the Attorney to produce documents listed below:

I, Alper Kolcu, Plaintiff in above-entitled case, requests defendant Sheriff Denita R. Ball to respond within 30 days to the following requests:

- 1) That defendant produces and permit Plaintiff to inspect and copy each of the following documents, on or around December 16, 2019, throughout the course of the Milwaukee Co. Criminal Case No. 19-CF-5571 and 22-CF-3754.
 - Name of the Medical Care Provider for the Milwaukee County Jail prior to and during the dates Plaintiff was under arrest, on or around December 16, 2019, throughout the course of the Milwaukee Co. Criminal Case No. 19-CF-5571.
 - Name of the Medical Care Provider for the Milwaukee County Jail prior to and during the dates Plaintiff was under arrest, on or around September 26, 2022, throughout the course of the Milwaukee Co. Criminal Case No. 22-CF-3754.

Regarding the Milwaukee Co. Criminal Case No. 19-CF-5571;

- MPD Incident No. 193640065, dated 12/14/19, 11:30 AM.
- Police Report, with Case No. 193490065.0 and CAD No. 193491039
- Initial Report by P.O. Trisha J. Klauser, dated 12/15/2019, 12:30 PM.
- Supplemental Report, Case No. 193490065.001,
- Supplemental Report, Case No. 193490065.002,
- Supplemental Report, Case No. 193490065.003,
- Supplemental Report, Case No. 193490065.004,
- Incident Report No. 19-000246 (Draft, dated 12/14/19, 00:00 AM)
- Identity of individual recorded as "Rianne" on the Incident Report, dated 12/14/19.
- Names of the Police Officers involved in prior, during and after the Central Booking Process, on or around, Dec. 17, 2019.
- Miranda Interview Records from Dec. 17, 2019.
- Supplemental Report by Det. Blomme, For Incident Report No. 19-000246, dated 12/17/2019.
- Supplemental Report by Det. Blomme, For Incident Report No. 19-000246, dated 01/06/2020.

- Supplemental Report by Det. Blomme, For Incident Report No. 19-000246, dated 01/07/2020.
- Supplemental Report by Det. Blomme, For Incident Report No. 19-000246, dated 02/07/2020.
- Court Order Authorizing GPS Device Installation on Plaintiff's Vehicle, dated 02/12/2020.
- Supplemental Report by Det. Blomme, For Incident Report No. 19-000246, dated 03/24/2020.
- Supplemental Report by Det. Blomme, For Incident Report No. 19-000246, dated 05/21/2020.
- Certified Copies of Transcripts from Preliminary Hearing of MKE CO. Case No. 19-CF-5571.
- Certified Copies of Transcripts from Jury Trial of MKE CO. Case No. 19-CF-5571.

Regarding the Milwaukee Co. Criminal Case No. 22-CF-3754;

- Police Report, with Case No. 193490065.0 and CAD No. 193491039
- Supplemental Report, Case No. 193490065.001,
- Supplemental Report, Case No. 193490065.002,

2) That defendant produce and permit Plaintiff to inspect and copy, test or sample each of the following documents;

- Name of the Medical Care Provider for the Milwaukee County Jail prior to and during the dates Plaintiff was arrested, on or around December 16 throughout the course of the Milwaukee Co. Criminal Case No. 19-CF-5571.
- Milwaukee County Sheriff's Office, Policy Manual.
- Milwaukee County Sensitive Crimes Division meetings, educations, conferences and trainings involving Milwaukee Police Department and Wauwatosa Police Department, between 2009 and 2020.

3) That defendant permit Plaintiff to enter and copy each of the following documents;

- Name of the Medical Care Provider for the Milwaukee County Jail prior to and during the dates Plaintiff was detained during the two arrests under 19CF5571 and 22CF3754.

Defendant to produce documents for;

U.S. District Court, WI E.D.
517 E Wisconsin Ave, 362,
Milwaukee, WI, 53233

Alper Kolcu
225 N 66th St,
Milwaukee, WI, 53213

CERTIFICATE OF SERVICE

I, Plaintiff, filed this Brief using the clerk of court office in-person. I further certify that the defendants in this action, via their counsel, are supplied with these documents via ***U.S. Mail.***

Dated: February 23, 2024.



Alper Kolcu
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Milwaukee, WI, 53213

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